

February 3, 1998

Mr. Larry Greene
Air Pollution Control Officer
Yolo-Solano Air Quality Management District
1947 Galileo Court, Suite 103
Davis, CA 95616

Re: Draft Title V Operating Permit - International Home Foods, Inc.

Dear Mr. Greene:

The U.S. Environmental Protection Agency (EPA) appreciates the opportunity to review the Yolo-Solano Air Quality Management District's (District) proposed Title V permit for International Home Foods, Inc. (No. F-97-03). In accordance with 40 CFR § 70.8 (c), and District Rule 3.19, the EPA has reviewed the proposed permit during our 45-day review period.

In general the proposed permit establishes enforceable conditions with adequate monitoring, record keeping and reporting requirements. However, as my staff has discussed with Mr. Jon Costantino of your staff, there are several issues/corrections that need addressing before the permit may be issued. We have enclosed our comments for your review.

Please note that if the permit is later found to require corrective steps (including, but not limited to, reopening for cause) the expiration of both EPA's review period and the public petition period does not compromise EPA's authority to take such measures. The terms contained in this permit are specific to the facility and do not create conditions for the use, operation, or reliance of any other party.

We appreciate your attention to our comments and look forward to working with you to resolve any outstanding issues. If you have any questions concerning our comments, please do not hesitate to contact John Walser of my staff at (415) 744-1257.

Sincerely,

Matt Haber
Chief, Permits Office

enclosure

cc: Ray Menebroker, CARB
Michael D. Harold, International Home Foods, Inc.

ENCLOSURE

EPA Comments on the Proposed Title V Operating Permit for International Home Foods, Inc.

1. *Boiler System* -- In the Title V Federal Operating Permit Conditions Section of the permit, Condition 22 states that the permittee shall not discharge from any single source of emission whatsoever, concentrations of sulfur compounds in excess of 0.2 percent calculated as sulfur dioxide (SO₂), by volume at standard conditions. As stated in the facility description section of the permit, the boilers burn only natural gas. In order to demonstrate compliance with the emission limits listed in the permit, the unit(s) should be limited to combusting PUC-regulated natural gas, or, if non-PUC regulated natural gas is combusted, periodic testing of the gas may be necessary to demonstrate compliance. PUC-regulated natural gas is tested and certified to meet a standard less than 5 grains/100 cu. ft. If the boilers have the capacity to fire on oil, there is potential for opacity violations and opacity monitoring would be required. Therefore, please add a condition clarifying PUC-regulated natural gas only shall be used and maintain records of fuel use.

2. *Particulate Matter* -- In the Compliance Section of the permit, Condition 22 (b) states that the permittee shall not discharge from any single source of emission whatsoever, concentrations of particulate matter combustion contaminants, in excess of 0.3 grains per cubic foot of gas calculated to 12 percent of carbon dioxide (CO₂) at standard conditions. As agreed to by Mr. Jon Costantino of your staff on 1/21/98, you must provide an analysis that clearly demonstrates compliance with this limit. The analysis, similar to the emission estimate methodology presented in the engineering evaluation, should demonstrate that your worst case expectation is within the compliance of the 0.3 grains per cubic foot limit. If demonstrated satisfactorily, no testing, recordkeeping or monitoring for particulate matter will be required.

3. *Boiler System* -- In the Equipment Specific Conditions Section of the permit, Condition 48 states that International Home Foods, Inc. shall, at least every twelve months, submit either source test or tune-up test reports on each unit. As discussed with and agreed to by Mr. Jon Costantino of your staff on 1/19/98, EPA requires periodic source testing in addition to tune-up or parametric monitoring of operational parameters. In this case, EPA recommends periodic source testing of the boilers (tomato season and normal schedule boilers) biennially prior to the beginning of the tomato season this year (i.e., May 1998). If compliance is shown for two consecutive source tests (i.e., in May 1998 and May 2000), then the units shall be tested once every 36 months thereafter (e.g., May 2003, May 2006). However, the source must return to biennial testing if noncompliance is shown.

As required by part 70, the permit must contain "compliance certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit." We concur with conducting tune-up tests or parametric monitoring of operational parameters on an annual basis as stated in Condition 48. This is important since boilers may idle for long periods of time, or at any time during the year undergo start-up and shutdown procedures to accommodate steam demands or other operational requirements.

The specific test methods required for source testing are listed in District Rule 2.27, Section 502.1. EPA believes that you should modify Condition 48 or add a new condition to the

permit identifying the appropriate test methods for NO_x and CO specifically. For example, District Rule 2.27 lists the following EPA approved test methods:

Compliance with NO_x emission requirements and the stack-gas CO and oxygen requirements shall be determined by the following test methods:

- a. Oxides of Nitrogen - CARB Method 100
- b. Carbon Monoxide - CARB Method 100
- c. Stack-Gas Oxygen - CARB Method 100

4. *Cooling Towers* -- In the Federally Enforceable Requirement Conditions Section of the permit, Condition 51 states that International Home Foods, Inc. shall not use or allow the use of chromium containing compounds in the treatment of cooling tower circulating water. EPA believes that this prohibition on chromium use precludes the need for periodic monitoring or sampling. However, if it is possible for International Home Foods, Inc. to purchase chromium containing compounds in the treatment of cooling tower circulating water, then recordkeeping or periodic monitoring will be required.

5. *Compliance* -- In the Compliance Section of the permit, Condition 21 references District Rule 2.11, SIP approved on 6/14/98. As you are probably aware, the SIP approval date is incorrect. The SIP approval date for District Rule 2.11, according to EPA records, was 6/14/78. Please change the date accordingly.

6. *MACT Standard* -- It is our understanding that the facility is not a major source of HAPs, as listed in the Yearly Facility Emission Summary Table (no reportable quantities identified) on Page 8 of the permit, and therefore not subject to the requirement for Maximum Control Technology (MACT) standards (40 CFR 63, Subpart Q). We recommend adding a discussion to the General Requirements section of the permit discussing this.

7. *Prompt Reporting* -- In the Recordkeeping and Reporting Conditions Section of the permit, Condition 25 states that any deviation from permit requirements shall be promptly reported to the APCO who will determine what constitutes "prompt" reporting. As you are aware, deviation reporting was identified as an interim approval issue for the District's Title V program (60 FR 21722). As stated in 60 FR 21722, the District's regulation should define the meaning of "prompt" reporting as used in the requirement found at 40 CFR 70.6(a)(3)(iii)(B), which requires prompt reporting of deviations from applicable requirements. An acceptable alternative to defining in the regulation what constitutes "prompt" is to define "prompt" in each individual permit. Therefore, since "prompt" is not defined in District Rule 3.8, Section 302.7a, the District should define "prompt" in Condition 25. As agreed to by Mr. Jon Costantino of your staff on 1/29/98, we suggest defining "prompt" reporting to mean within 2 to 10 days.

8. *Pneumatic Flour Handling System* -- The proposed permit contains a 0.3 grains per cubic foot particulate matter emission limit (Condition 21). The District has agreed to provide a demonstration that all units will be in compliance with the emission limits. However, no stack testing is required, and the permits do not provide for inspection, maintenance and repair to ensure that the two Semco 1150 cfm bag filter dust collectors will always achieve the level of control necessary to assure compliance (see permit to operate P-38-72(t)). EPA recommends adding a condition to the permit that states that the dust collectors shall be inspected daily while

in operation for evidence of particulate matter breakthrough and replaced as needed. At least one spare set of dust collector filters should be maintained on the premises at all times. Also, records of dust collector inspections, maintenance, and repair shall be maintained. These records should include identification of the dust collector, date of inspection, any corrective action taken as a result of the inspection, and the initials of the personnel performing the inspection.